REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed July 28, 2005. Reconsideration and allowance of the application and pending claims are respectfully requested.

I.   Claim Rejections - 35 U.S.C. § 102(e)

Claims 1, 2, 7-9, 17, 18, and 21-23 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Redlich, et al. ("Redlich," U.S. Pub. No. 2002/0091734).

As is noted above, independent claims 1 and 17 have been amended through this Response. In view of those amendments, Applicant respectfully submits that the rejection is moot as having been drawn against the claims in a previous form. Accordingly, Applicant respectfully requests that the rejection be withdrawn.

II.   Claim Rejections - 35 U.S.C. § 103(a)

A.   Rejection of Claims 3, 5, 6, and 19

Claims 3, 5, 6, and 19 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Redlich.

As is noted above, independent claims 1 and 17 have been amended through this Response. In view of those amendments, Applicant respectfully submits that the rejection is moot as having been drawn against the claims in a previous form. Accordingly, Applicant respectfully requests that the rejection be withdrawn.

B.   Rejection of Claims 4, 10-16, and 20

Claims 4, 10-16, and 20 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over <u>Redlich</u> in view of <u>Schneck, et al.</u> ("Schneck," U.S. Pat. No. 5,933,498). Applicant respectfully traverses this rejection.

As has been acknowledged by the Court of Appeals for the Federal Circuit, the U.S. Patent and Trademark Office ("USPTO") has the burden under section 103 to establish a *prima facie* case of obviousness by showing some objective teaching in the prior art or generally available knowledge of one of ordinary skill in the art that would lead that individual to the claimed invention. *See In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). The Manual of Patent Examining Procedure (MPEP) section 2143 discusses the requirements of a *prima facie* case for obviousness. That section provides as follows:

> To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teaching. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and reasonable expectation of success must be found in the prior art, and not based on applicant's disclosure.

In the present case, the prior art does not teach or suggest all of the claim limitations, and there is no suggestion or motivation in the prior art to modify the references

to include those limitations. Applicant discusses the references and Applicant's claims in the following.

1. The Redlich Disclosure

Redlich discloses a data security system and method. <u>Redlich</u>, Application Title. As is described by Redlich, the method comprises establishing a group of security sensitive terms, filtering data and *extracting and separating* the security items from remainder data. <u>Redlich</u>, Abstract (emphasis added). Later, reconstruction of the data is permitted only in the presence of a predetermined security clearance. <u>Redlich</u>, Abstract.

Redlich provides more detail as to the system and method in the Detailed Description. There, Redlich states:

FIG. 1A diagrammatically illustrates the basic processes for establishing a secure storage of information, generally identified herein as "data." "Data," as used herein, includes any data object, e.g., text, images, icons, etc. Sound bites and video images may also be extracted data. A source document 100, sometimes referred to as a "plaintext," is passed through a filter 102. Filter 102, in a most basic sense, *separates out* common text or remainder data 104 from uncommon text, words, characters or icons. The security sensitive words, characters or icons are *separated from* remainder or common text 104 as extracted text 106. It should be noted that although the word "text" is utilized with respect to remainder text 104 and extracted text 106, the text is a data object and includes words, phrases, paragraphs, single characters, portions of words, characters, whole or partial images, or icons. In a basic implementation, filter 102 may utilize a dictionary such that words present in the dictionary (common words) are separated from the source plaintext document 100 and placed into remainder document or common data file 104. *The uncommon words (extracted-*

security sensitive words), not found in the dictionary, would be placed in an extracted text or extracted data file 106. For example, a business may wish to impose a security system on a contract document such that the names of the contracting parties (not found in the dictionary) and the street names (not found in the dictionary) would be stored in extracted data text file 106. *The common text or remainder data would be stored in remainder data file 104.* In the illustrated embodiment, remainder data file 104 also includes place holders which enables the extracted data to be easily inserted or set back into the remainder data file.

[Redlich, paragraph 0072 (emphasis added)]

From the above, it is clear that Redlich teaches "separating out" data, and storing that data in a separate location from the "remainder" data. Redlich explains the reasoning behind and importance of such separation:

The present invention introduces multiple levels and standards of security. *It is common knowledge that the highest security is delivered through total separation.* Whereas this concept has only been implemented physically or by isolating computer environments, *the invention achieves this concept of total separation within open and networked computer environments.* The invention can implement a *total physical and logical separation of important and critical data from its context* and can preclude access to that information without a needed granular access permission. The invention is also effective for sounds and images (data objects as security words, characters, terms or icons)

[Redlich, paragraph 0028 (emphasis added)]

Accordingly, it can be appreciated that it is of high importance to Redlich that the sensitive data is extracted and physically separated from the non-sensitive data of a document.

2.   Applicant's Claims

Independent claims 1, 10, and 17 from which rejected claims 4, 10-16, and 20 depend, provide as follows (emphasis added):

1.   A method comprising:

receiving a request for a document;

identifying a source of the request;

determining an authorization level associated with the source of the request;

determining an authorization level required to view the requested document;

if the source of the request is authorized to view the entire requested document, transmitting the requested document to the source of the request; and

if the source of the request is not authorized to view the entire requested document, *redacting unauthorized portions of the requested document by visually blurring the unauthorized portions* and transmitting the redacted version of the requested document to the source of the request.

10.   A method comprising:

receiving a document;

determining an authorization level required to view the complete received document;

determining an authorization level associated with a current user;

if the current user is authorized to view the complete received document, displaying the received document; and

if the current user is not authorized to view the complete received document, *redacting unauthorized portions of the received document by visually blurring the unauthorized portions* and displaying the redacted version of the document.

17. A computer-readable media having stored thereon a plurality of instructions that, when executed by a processor, cause the processor to perform acts comprising:

identifying a source of a request for a document;

determining an authorization level associated with the source of the request;

determining an authorization level required to view the entire requested document;

if the source of the request is authorized to view the entire requested document, transmitting the requested document to the source of the request; and

if the source of the request is not authorized to view the entire requested document, *redacting unauthorized portions of the requested document by visually blurring the unauthorized portions* and transmitting the redacted version of the requested document to the source of the request.

As is evident from the above, each of claims 1, 10, and 17 recites the action of "redacting unauthorized portions of the requested document by visually blurring the unauthorized portions". As is acknowledged in the Office Action, Redlich does not teach or suggest such an action. It is argued, however, that it would have been obvious to

modify the Redlich system and method to include that action in view of Schneck. Applicant disagrees.

As is described above, Redlich teaches "separating out" sensitive data, and storing that data in a separate location from the "remainder" data. Furthermore, Redlich considers this treatment of the sensitive data to be important and has specifically designed his system and method to provide such separation. In view of this, Redlich clearly teaches away from a solution in which sensitive data is left in a document. It logically follows that Redlich would teach away from leaving sensitive data in a document and "visually blurring" the sensitive data due to the security risk such an action would pose.

In view of Redlich's teaching away from leaving sensitive data in a document with non-sensitive data, a rejection that argues that it would have been obvious to leave sensitive data in the document is improper under 35 U.S.C. § 103. As is well established in the law, "[t]here is no suggestion to combine . . . if a reference teaches away from its combination with another source . . . A reference may be said to teach away when a person of ordinary skill, upon reading the reference, would be discouraged from following the path set out in the reference, or would be led in a direction divergent from the path that was taken by the applicant . . ." *Tec Air, Inc. v. Denso Manufacturing Michigan Inc.*, 192 F.3d 1353, 52 USPQ2d 1294 (Fed. Cir. 1999). For at least this reason, the rejection should be withdrawn.

As a further matter, Applicant notes that Schneck's described "blacking out" of redacted words is not "visually blurring" data. Simply stated, Schneck covers the data up, but does not "blur" any data. As is described in Applicant's specification, "blurring" includes actions such as blurring the data so that "the general appearance of the redacted

data portion remains visible, but the details of the redacted portion are not visible." Applicant's specification, page 2, lines 18-20.

III. Canceled Claims

Claims 3-4, 6, 12-13, and 19-20 have been canceled from the application without prejudice, waiver, or disclaimer. Applicant reserves the right to present these canceled claims, or variants thereof, in continuing applications to be filed subsequently.
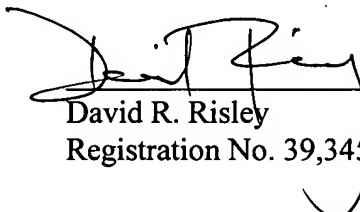
IV. New Claims

Claims 24-26 have been added into the application through this Response. Applicant respectfully submits that these new claims describe an invention novel and unobvious in view of the prior art of record and, therefore, respectfully requests that these claims be held to be allowable.

CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Assistant Commissioner for Patents, Alexandria, Virginia 22313-1450, on

_10-3-05_.

Mary Meegan
Signature